

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: William F. Boehlke) Case No. 19-10144
) Chapter 13 Proceedings
Debtor.) Judge Jessica E. Price Smith

**CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR'S
MOTION TO MODIFY UNCONFIRMED CHAPTER 13 PLAN**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's Motion to Modify Unconfirmed Chapter 13 Plan filed with this Court on August 7, 2019 (hereinafter "Debtor's Motion"). In support of her objection, the Trustee makes the following representations to the Court:

1. The Trustee's Objection to Confirmation filed with the Court on June 27, 2019 has not been resolved. Specifically, the Prosecution paragraph is not resolved. The Debtor needs to provide proof the first quarter estimated income tax payment for 2019 was made or proof Debtor has money in savings for taxes of \$816.00 monthly per Schedule J.
2. Per the Debtor's tax returns and pay stubs Debtor appears to business net income is at least \$3,374.00. Therefore, the Debtor is an above median income and Form 22C should reflect the applicable commitment period of 60 months.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Motion for the reasons cited.

Respectfully submitted,

/S/ Holly Davala
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CERTIFICATE OF SERVICE

I certify that on August 13, 2019, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Y. Eric Holtz, Attorney, on behalf of Debtor at yeholtz@amourgis.com

Lisa M. Lahrmer, Attorney, on behalf of Debtor at llahrmer@amourgis.com

/S/ Holly Davala

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